

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MAZEN OWYDAT,)
YOUSSEF MEQUEH and)
SALEH ALKHAFAJI d/b/a WEST)
FLORISSANT BP f/k/a)
WEST FLORISSANT AMOCO,)
)
Petitioners/Plaintiffs,)
) Cause No. 4:20-cv-00388-NAB
vs.)
)
CITY OF ST. LOUIS and)
BOARD OF ADJUSTMENT OF THE)
CITY OF ST. LOUIS, MISSOURI,)
)
Respondents/Defendants.)

DEFENDANTS' INITIAL DISCLOSURES PURSUANT TO RULE 26(a)(1)

Come now defendants, and in compliance with the Case Management Order of this Court of May 22, 2020 issued in this case, make the following initial disclosures pursuant to FRCP 26(a)(1):

Although plead under different titles, plaintiffs' claims all amount to a petition for judicial review. Therefore, this cause should be exempt from the initial disclosure requirements pursuant to F.R.C.P. 26 (a)(1)(E)(i). However, in an abundance of caution, respondents state as follows:

1. Persons likely to have discoverable information relevant to the disputed facts alleged in the pleadings are as follows:
 - a. Mary Hart Burton, Zoning Administrator, City Hall, Room 400, St. Louis, MO 63103, (314) 622-3666.
 - b. Joe Klitzing, Board of Adjustment member, City Hall, Room 400,

St. Louis, MO 63103, (314) 622-3666.

c. John Albert, Board of Adjustment member, City Hall, Room 400,

St. Louis, MO 63103, (314) 622-3666.

d. Mel Desemone, Board of Adjustment member, City Hall, Room 400, St. Louis, MO 63103, (314) 622-3666.

e. Mona Parsley, Board of Adjustment member, City Hall, Room 400, St. Louis, MO 63103, (314) 622-3666.

f. Irene Soll, Board of Adjustment member, City Hall, Room 400, St. Louis, MO 63103, (314) 622-3666.

g. Erin Godwin, Zoning Plan Examiner, City Hall, Room 400, St. Louis, MO 63103, (314) 622-3666.

2. The following categories¹ of documents may be relevant to disputed facts alleged in the pleadings:

a. The administrative record.

b. The decision of the Board of Adjustment.

Respectfully submitted,

JULIAN L. BUSH,
CITY COUNSELOR

By: /s/ Travis F. Warren
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¹ This list does not include those categories of documents protected by privilege and/or the work product doctrine, including, without limitation, the plaintiff's litigation file.

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all attorneys of record and also by email to Helmut Starr, hstarr@chgolaw.com.

/s/ Travis F. Warren